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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to:

Best Buy Co., et al. v. Hitachi, LTD, et al.,
Individual Case No. 11-cv-05513

Circuit City, et al. v. Hitachi, LTD., et al.,
Individual Case No. 11-cv-05502

Costco Wholesale Corporation v. Hitachi,
Ltd., et al., Individual Case No. 11-cv-06397

Electrograph Systems, Inc., et al. v. Hitachi,
LTD., et al., Individual Case No. 11-cv-01656

Case No. 07-5944 SC

MDL No. 1917

**DECLARATION OF JASON C. MURRAY
IN SUPPORT OF PLAINTIFFS' JOINT
OPPOSITION TO LGE DEFENDANTS'
MOTION FOR PARTIAL SUMMARY
JUDGMENT ON STANDING GROUNDS**

1 *Interbond Corporation of America d/b/a*
2 *BrandsMart USA v. Hitachi, Ltd., et al.,*
Individual Case No. 11-cv-06275

3 *Office Depot Inc. v. Hitachi Ltd., et al.,*
4 Individual Case No. 11-cv-06276

5 *P.C. Richard & Son Long Island Corporation*
6 *et al. v. Hitachi Ltd., et al.,* Individual Case
No. 12-cv-02648

7 *Schultze Agency Services, LLC on behalf of*
8 *Tweeter OPCO, LLC, et al., v. Technicolor SA,*
et al., Individual Case No. 13-cv-05668

9 *Sears, Roebuck and Co. and Kmart Corp v.*
10 *Chunghwa Picture Tubes, Ltd., et al.,*
Individual Case No. 11-cv-05514

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12 *Target Corp. v. Chunghwa Picture Tubes,*
LTD., et al., Individual Case No. 11-cv-05514

13 *Tech Data Corp., et al. v. Hitachi, LTD., et al.,*
14 Individual Case No. 13-cv-00151

15 *ViewSonic Corp. v. Chunghwa Picture Tubes,*
16 *Ltd., et al.,* Individual Case No. 14-02510

1 I Jason C. Murray hereby declare:

2 I am an attorney with the law firm of Crowell & Moring LLP, counsel of record for
3 Plaintiffs Target Corporation and ViewSonic Corporation in the above entitled action. I am
4 licensed in the State of California and admitted to practice before this Court. I make this
5 declaration based on my personal knowledge and, if called upon as a witness, could and would
6 testify competently as to the matters set forth below:

- 7 1. Attached hereto as **Exhibit 1** is a true and correct copy of the Summary of Commission
8 Decision; EC Decision Case COMP/39.437.
- 9 2. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the deposition
10 transcript of Young Bae Na, in this litigation taken on September 23, 2014.
- 11 3. Attached hereto as **Exhibit 3** is a true and correct copy of EC Case No COMP/M.2263,
12 Phillips/LG Electronics JV.
- 13 4. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of a document
14 produced by LPD in this litigation, bearing Bates Nos. LPD-NL00157837-LPD-
15 NL00157838.
- 16 5. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced by LGE
17 in this litigation, bearing Bates Nos. LGE0000054- LGE0000161.
- 18 6. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts of LGE's 2002
19 Annual Report produced by LGE in this litigation, bearing Bates Nos. LGE0000429.
- 20 7. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts of LGE's 2003
21 Annual Report produced by LGE in this litigation, bearing Bates Nos. LGE00093341-
22 LGE00093346.
- 23 8. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts of LGE's 2004
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1 Annual Report produced by LGE in this litigation, bearing Bates Nos. LGE00093824-
2 LGE00093827.

3 9. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts of LGE's 2005
4 Annual Report produced by LGE in this litigation, bearing Bates Nos. LGE00092546-
5 LGE00092549.

6 10. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts of LGE's 2006
7 Annual Report produced by LGE in this litigation, bearing Bates Nos. LGE00092614-
8 LGE00092633.

9 11. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts of LGE's 2007
10 Annual Report produced by LGE in this litigation, bearing Bates Nos. LGE00092678-
11 LGE00092682.

12 12. Attached hereto as **Exhibit 12** is a true and correct copy of a document produced by
13 Philips in this litigation, bearing Bates No. PHLP-CRT-053809.

14 13. Attached hereto as **Exhibit 13** is a true and correct copy of a document produced by LPD
15 in this litigation, bearing Bates Nos. LPD-NL00052805-LPD-NL00052811.

16 14. Attached hereto as **Exhibit 14** is a true and correct copy of excerpts of a document
17 produced by Philips in this litigation, bearing Bates No. PHLP-CRT-002306.

18 15. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts of a document
19 produced by LGE in this litigation, bearing Bates Nos. LGE00092012-LGE00092018.

20 16. Attached hereto as **Exhibit 16** is a true and correct copy of a document produced by LPD
21 in this litigation, bearing Bates Nos. LPD-NL00106951-LPD-NL00106955.

22 17. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts from the deposition
23 transcript of Wiebo Vaartjes, taken on December 18, 2013.
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1 18. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts from the deposition
2 transcript of Frans Spaargaren taken on August 27, 2014.

3 19. Attached hereto as **Exhibit 19** is a true and correct copy of excerpts of ta document
4 produced by LPD in this litigation, bearing Bates Nos. LPD-NL00263834-LPD-
5 NL00263841.

6 20. Attached hereto as **Exhibit 20** is a true and correct copy of deposition exhibit 7502
7 marked at the deposition of Young Bae Na, taken on September 23, 2014.

8 21. Attached hereto as Appendix A is an index to **Exhibits 21-44**, quoting certain documents,
9 meeting minutes, and depositions taken or produced in this litigation.

10 22. Attached hereto as **Exhibit 21** is a true and correct copy of deposition exhibit 1112 and
11 1112E marked at the deposition of Chun-Liu Chih, taken on February 19, 2013.

12 23. Attached hereto as **Exhibit 22** are true and correct copies of deposition exhibits 1850 and
13 1850E marked at the deposition of Phil Jae Lee, taken on July 16, 2013.

14 24. Attached hereto as **Exhibit 23** is a true and correct copy of a document and the English
15 language translations, produced by Chunghwa in this litigation, bearing Bates No.
16 CHU00028899 - CHU00028900.

17 25. Attached hereto as **Exhibit 24** is a true and correct copy of a document and the English
18 language translations, produced by Chunghwa in this litigation, bearing Bates No.
19 CHU00028897 - CHU00028898.

20 26. Attached hereto as **Exhibit 25** are true and correct copies of deposition exhibits 1299 and
21 1299E marked at the deposition of Jing Song Lu, taken on February 27, 2013.

22 27. Attached hereto as **Exhibit 26** is a true and correct copy of a document and the English
23 language translations, produced by Chunghwa in this litigation, bearing Bates No.
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CHU00029238 - CHU00029240.

28. Attached hereto as **Exhibit 27** are true and correct copies deposition exhibits 1108 and 1108E marked at the deposition of Chun-Liu Chih, taken on February 19, 2013.

29. Attached hereto as **Exhibit 28** are true and correct copies deposition exhibits 1146 and 1146E marked at the deposition of Chun-Liu Chih, taken on February 19, 2013.

30. Attached hereto as **Exhibit 29** are true and correct copies deposition exhibits 1249 and 1249E marked at the deposition of Sheng-Jen Yang taken on February 22, 2013.

31. Attached hereto as **Exhibit 30** are true and correct copies of deposition exhibits 1150 and 1150E marked at the deposition of Chun-Liu Chih, taken on February 19, 2013.

32. Attached hereto as **Exhibit 31** are true and correct copies of deposition exhibits 719 and 719E marked at the deposition of Michael Song, taken on February 6, 2013.

33. Attached hereto as **Exhibit 32** are true and correct copies deposition exhibits 1255 and 1255E marked at the deposition of Sheng-Jen Yang taken on February 22, 2013.

34. Attached hereto as **Exhibit 33** are true and correct copies of deposition exhibits 1153 and 1153E marked at the deposition of Chun-Liu Chih, taken on February 19, 2013.

35. Attached hereto as **Exhibit 34** are true and correct copies deposition exhibits 1259 and 1259E marked at the deposition of Sheng-Jen Yang taken on February 22, 2013.

36. Attached hereto as **Exhibit 35** are true and correct copies deposition exhibits 5610 and 5610E marked at the deposition of Kyu In "Quin"Choi taken on August 25, 2014.

37. Attached hereto as **Exhibit 36** are true and correct copies deposition exhibits 1157 and 1157E marked at the deposition of Kyu In "Quin"Choi taken on August 25, 2014.

38. Attached hereto as **Exhibit 37** are true and correct copies deposition exhibits 1260 and 1260E marked at the deposition of Sheng-Jen Yang taken on February 22, 2013.

1 39. Attached hereto as **Exhibit 38** are true and correct copies of deposition exhibits 706 and
2 706E marked at the deposition of Michael Song, taken on February 6, 2013.

3 40. Attached hereto as **Exhibit 39** are true and correct copies of deposition exhibits 1163 and
4 1163E marked at the deposition of Chun-Liu Chih, taken on February 20, 2013.

5 41. Attached hereto as **Exhibit 40** are true and correct copies deposition exhibits 1264 and
6 1264E marked at the deposition of Sheng-Jen Yang taken on February 22, 2013.

7 42. Attached hereto as **Exhibit 41** are true and correct copies of deposition exhibits 1168 and
8 1168E marked at the deposition of Chun-Liu Chih, taken on February 20, 2013.

9 43. Attached hereto as **Exhibit 42** are true and correct copies of deposition exhibits 1171 and
10 1171E marked at the deposition of Chun-Liu Chih, taken on February 20, 2013.

11 44. Attached hereto as **Exhibit 43** are true and correct copies a document and the English
12 language translations, produced by Chunghwa in this litigation, bearing Bates No.
13 CHU00024554 - CHU00024559.

14 45. Attached hereto as **Exhibit 44** are true and correct copies of deposition exhibits 1175 and
15 1175E marked at the deposition of Chun-Liu Chih, taken on February 20, 2013.

16 46. Attached hereto as Appendix B is an index to **Exhibits 45-65**, quoting certain documents,
17 meeting minutes, and depositions taken or produced in this litigation.

18 47. Attached hereto as **Exhibit 45** are true and correct copies of deposition exhibits 1176 and
19 1176E marked at the deposition of Chun-Liu Chih, taken on February 20, 2013.

20 48. Attached hereto as **Exhibit 46** are true and correct copies of a document and the English
21 language translations, produced by Chunghwa in this litigation, bearing Bates Nos.
22 CHU00660324 - CHU00660328.

23 49. Attached hereto as **Exhibit 47** are true and correct copies of deposition exhibits 1671 and
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1671E marked at the deposition of Hoon Choi, taken on June 19, 2013.

50. Attached hereto as **Exhibit 48** are true and correct copies of deposition exhibits 1181 and

1181E marked at the deposition of Chun-Liu Chih, taken on February 20, 2013.

51. Attached hereto as **Exhibit 49** are true and correct copies of a document and the English

language translations, produced by Chunghwa in this litigation, bearing Bates Nos.

CHU00031174 - CHU00031175.

52. Attached hereto as **Exhibit 50** are true and correct copies of a document and the English

language translations, produced by Chunghwa in this litigation, bearing Bates No.

CHU00031177.

53. Attached hereto as **Exhibit 51** are true and correct copies of deposition exhibits 1182 and

1182E marked at the deposition of Chun-Liu Chih, taken on February 20, 2013.

54. Attached hereto as **Exhibit 52** is a true and correct copy of deposition exhibits 4002

marked at the deposition of Lawrence Wu, taken on September 12, 2014.

55. Attached hereto as **Exhibit 53** are true and correct copies of deposition exhibits 1202 and

1202E marked at the deposition of Chun-Liu Chih, taken on February 20, 2013.

56. Attached hereto as **Exhibit 54** are true and correct copies of a document and the English

language translations, produced by Chunghwa in this litigation, bearing Bates Nos.

CHU00660282 - CHU00660283.

57. Attached hereto as **Exhibit 55** are true and correct copies of a document and the English

language translations, produced by Chunghwa in this litigation, bearing Bates Nos.

CHU00031183 - CHU00031185.

58. Attached hereto as **Exhibit 56** are true and correct copies of a document and the English

language translations, produced by Chunghwa in this litigation, bearing Bates Nos.

CHU00660298 - CHU00660301.

59. Attached hereto as **Exhibit 57** are true and correct copies of a document and the English language translations, produced by Chunghwa in this litigation, bearing Bates Nos.

CHU00660286 - CHU00660288.

60. Attached hereto as **Exhibit 58** are true and correct copies deposition exhibits 1269 and 1269E marked at the deposition of Sheng-Jen Yang taken on February 22, 2013.

61. Attached hereto as **Exhibit 59** is a true and correct copy deposition exhibit 1873 marked at the deposition of Jin Kang Jun taken on July 20, 2013.

62. Attached hereto as **Exhibit 60** are true and correct copies deposition exhibit 1879 and 1879E marked at the deposition of Jin Kang Jun taken on July 20, 2013.

63. Attached hereto as **Exhibit 61** are true and correct copies of a document and the English language translations, produced by Chunghwa in this litigation, bearing Bates Nos.

CHU00014208 - CHU00014209.

64. Attached hereto as **Exhibit 62** are true and correct copies of a document and the English language translations, produced by Chunghwa in this litigation, bearing Bates Nos.

CHU00014210 - CHU00014211.

65. Attached hereto as **Exhibit 63** is a true and correct copy of a document produced by Philips in this litigation, bearing Bates Nos. PHLP-CRT-005940 - PHLP-CRT-005942.

66. Attached hereto as **Exhibit 64** is a true and correct copy of excerpts from the deposition transcript of Pil Jae Lee, taken on July 16, 2013.

67. Attached hereto as **Exhibit 65** is a true and correct copy of excerpts from the deposition transcript of Jin Kang Jung, taken on July 19, 2013.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed this 23th day of December, 2014, at Los Angeles,
3 California.

4
5 Dated: December 23, 2014

/s/ Jason C. Murray

Jason C. Murray (CA Bar No. 169806)

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